

August 1, 1997

Mr. Karl Krause, Manager
Engineering Section
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

Re: Proposed Title V Permits: Torch Operating Company, No. 1492-131
Cal Resources LLC/Sespe Compressor Plant No. 0990

Dear Mr. Krause:

Thank you for the opportunity to review the two proposed Title V permits listed above. We received them on June 17, 1997. The enclosure to this letter conveys EPA Region 9's comments on these proposed permits.

The proposed permits included most of the generally required elements of Title V program regulations. However, as we mentioned during the July 16, conference call with your permit engineers (Mr. Kerby Zozula and Ms. Laura Kranzler), one omission from the permits is a requirement for semi-annual monitoring reports. This requirement needs to be included in each Title V permit. In addition, both proposed permits include a permit term starting from January 1997. This is misleading, since the permits will not become effective until and unless they are issued by the District after the 45-day EPA review period has ended and comments have been addressed.

During the July 16 call, my staff also discussed EPA's main concern of the lack of specificity of some monitoring requirements. In particular, both permits included the phrase "routine surveillance" for a variety of monitoring regimes. Without a clear definition of "routine surveillance," it is sometimes not possible for EPA to determine whether this form of monitoring would satisfy Part 70's periodic monitoring requirement and whether it will assure compliance with the underlying requirement.

As per the commitment made during the conference call, we trust that your staff is reviewing this issue and those permit conditions that incorporate the use of "routine surveillance." We will continue to work with your staff to resolve this important issue.

We expect that the District will address the enclosed comments before issuing the final permits. We also encourage the District to consider our other recommendations as well. Please note that if a permit is later found to require corrective steps (including, but not limited to, reopening the permit for cause) the expiration of both EPA's review period and the public petition period does not compromise the Agency's authority to take such measures.

We hope these comments are useful in continuing your Title V permit program. We look forward to working with your staff to resolve any outstanding issues. Please call Nahid Zoueshtiagh at (415) 744-1261 if you have any questions.

Sincerely,

Matt Haber
Chief, Permits Office
Air Division

Enclosures

cc: Mr. Ray Menebroker, ARB
Mr. John Deacon (Torch Operating Company) (w/o Enclosure II)
Mr. T. A. Christenson (Cal Resources LLC) (w/o Enclosure III)